

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

Case # 17-20775

HON. ROBERT CLELAND

ANTHONY MARROCCO,

Defendant.

_____ /

MOTION FOR DOWNWARD VARIANCE

Now comes Anthony Marrocco, by and through his attorney Steven Fishman, and in support of his Motion for Downward Variance states as follows:

1. Mr. Marrocco is scheduled for sentencing on January 26, 2023.
2. The parties agree that his sentencing guideline range is 10-16 months.
3. Defense counsel intends to argue that the Court should grant a downward variance and impose a non-custody sentence.
4. The reasons for defense counsel's request will be set forth in his sentencing memorandum which will be filed timely in accordance with the Court's scheduling order.

WHEREFORE, Defendant Marrocco requests that the Court grant his Motion for Downward Variance.

Respectfully submitted,

s/ Steven Fishman
Steven Fishman (P23049)
615 Griswold, Suite #1120
Detroit, MI 48226
e-mail: sfish66@yahoo.com

Dated: January 9, 2023

BRIEF IN SUPPORT OF
MOTION FOR DOWNWARD VARIANCE

The relief requested in the attached motion lies within the sound discretion of the trial judge.

s/ Steven Fishman
Steven Fishman (P23049)
Attorney for Defendant
615 Griswold, Suite #1120
Detroit, MI 48226
(313) 920-2001
e-mail: sfish66@yahoo.com

Dated: January 9, 2023

CERTIFICATE OF SERVICE

On January 9, 2023, I served a copy of the attached Motion for Downward Variance upon Steven Cares, AUSA, by filing same electronically.

s/ Steven Fishman
Steven Fishman